

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

JUDY SINGLEY, individually and as
Guardian for DANA LOUISE
SINGLEY,

NO. C09-5443 RBL

DECLARATION OF IAN M. BAUER

Plaintiffs,

V.

AACRES LANDING, INC., et al.,

Defendants.

IAN M. BAUER hereby declares as follows:

1. I am over 21 years of age and am competent to testify about the matters stated herein. I make this declaration based upon my personal knowledge.

2. I am an Assistant Attorney General assigned to represent Defendant State of Washington, Department of Social and Health Services, Division of Developmental Disabilities (“**Department**”), in the above-captioned lawsuit.

3. True and correct copies of excerpts from the deposition of Plaintiff Judy Singley taken on March 2, 2011, pages 20-23, 27-28, 32-41, 44-45, 50-51, 62-69, 86, are attached hereto as **Exhibit A**.

1 4. True and correct copies of excerpts from the deposition of Plaintiff Dana
2 Singley taken on March 2, 2011, pages 13-20, 42-43, 51-56, 69-70, are attached hereto as
3 **Exhibit B.**

4 5. A true and correct copy of Exhibit 1 from the deposition of Plaintiff Judy
5 Singley taken on March 2, 2011, is attached hereto as **Exhibit C.** This document was also
6 marked as Exhibit 1 to the deposition of Teri O'Donnell, taken on March 3, 2011.

7 6. A true and correct copy of Exhibit 2 from the deposition of Plaintiff Judy
8 Singley taken on March 2, 2011, is attached hereto as **Exhibit D.**

9 7. A true and correct copy of Exhibit 3 from the deposition of Plaintiff Judy
10 Singley taken on March 2, 2011, is attached hereto as **Exhibit E.**

11 8. A true and correct copy of Exhibit 4 from the deposition of Plaintiff Judy
12 Singley taken on March 2, 2011, is attached hereto as **Exhibit F.**

13 9. A true and correct copy of Exhibit 5 from the deposition of Plaintiff Judy
14 Singley taken on March 2, 2011, is attached hereto as **Exhibit G.**

15 10. A true and correct copy of Exhibit 6 from the deposition of Plaintiff Judy
16 Singley taken on March 2, 2011, is attached hereto as **Exhibit H.**

17 11. A true and correct copy of Exhibit 7 from the deposition of Plaintiff Judy
18 Singley taken on March 2, 2011, is attached hereto as **Exhibit I.**

19 12. A true and correct copy of Exhibit 8 from the deposition of Plaintiff Judy
20 Singley taken on March 2, 2011, is attached hereto as **Exhibit J.**

21 13. A true and correct copy of Exhibit 9 from the deposition of Plaintiff Judy
22 Singley taken on March 2, 2011, is attached hereto as **Exhibit K.**

23 14. A true and correct copy of Exhibit 10 from the deposition of Plaintiff Judy
24 Singley taken on March 2, 2011, is attached hereto as **Exhibit L.** This document was also
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1 marked as Exhibit 10 to the depositions of Teri O'Donnell and Denise Pech, taken on March 3,
2 2011, and the deposition of Anita Delight on April 12, 2011.

3 15. A true and correct copy of Exhibit 11 from the deposition of Plaintiff Judy
4 Singley taken on March 2, 2011, is attached hereto as **Exhibit M**. This document was also
5 marked as Exhibit 11 to the depositions of Teri O'Donnell and Denise Pech, taken on March 3,
6 2011.

7 16. A true and correct copy of Exhibit 12 from the deposition of Plaintiff Judy
8 Singley taken on March 2, 2011, is attached hereto as **Exhibit N**.

9 17. A true and correct copy of Exhibit 13 from the deposition of Plaintiff Judy
10 Singley taken on March 2, 2011, is attached hereto as **Exhibit O**.

11 18. A true and correct copy of Exhibit 14 from the deposition of Teri O'Donnell
12 taken on March 3, 2011, is attached hereto as **Exhibit P**.

13 19. A true and correct copy of Exhibit 19 from the deposition of Denise Pech taken
14 on March 3, 2011, is attached hereto as **Exhibit Q**. This document was also marked as Exhibit
15 19 to the deposition of Sandi Miller, taken on April 11, 2011.

16 20. True and correct copies of excerpts from the deposition of Kimberly Calkins
17 taken on April 11, 2011, pages 8-9, 14, and 26 are attached hereto as **Exhibit R**.

18 21. True and correct copies of excerpts from the deposition of Sandra Miller taken
19 on April 11, 2011, pages 8, 20-24, 26, 30 and 32-33 are attached hereto as **Exhibit S**.

20 22. True and correct copies of Exhibits 20-33 from the deposition of Kimberly
21 Calkins taken on April 11, 2011, are attached hereto as **Exhibit T**.

22 23. True and correct copies of Exhibits 34-35 from the deposition of Kimberly
23 Calkins taken on April 11, 2011, are attached hereto as **Exhibit U**.

24 I declare under penalty of perjury under the laws of the State of Washington that the
25 above declaration is true and correct to the best of my knowledge.

1 I declare under penalty of perjury under the laws of the State of Washington that the
2 above declaration is true and correct to the best of my knowledge.

3 DATED at Tumwater, Washington this 14th day of April, 2011.
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5 /s/ Ian M. Bauer

6 IAN M. BAUER

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PROOF OF SERVICE

I hereby certify that on April 14, 2011, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Darrell Cochran: Darrell@pcvklaw.com

Dennis J. La Porte: laporte@524law.com

/s/ Ian M . Bauer
IAN M. BAUER, WSBA No. 35563
Assistant Attorney General